

**From:** [Janet Hoffman](#)  
**To:** [Ethan Hazel](#)  
**Subject:** FW: follow up on protective order and document request  
**Date:** Friday, February 3, 2023 3:19:46 PM

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**From:** Bruce, Gavin (USAOR) <Gavin.Bruce@usdoj.gov>  
**Sent:** Friday, February 3, 2023 2:48 PM  
**To:** Janet Hoffman <Janet@jhoffman.com>  
**Cc:** Katherine Marchant <katie@jhoffman.com>  
**Subject:** RE: follow up on protective order and document request

**External Sender:** This email came from outside of the firm. Exercise caution with any attachments or links.

Janet –

If the documents contain PII of third parties, we would ask that they be redacted prior to providing to Ms. Hankins.

As to your previous request for records, we are processing those now and will be producing items that I outlined on our phone call (i.e. specific emails regarding vendor and ticket sales, bank statements, and promissory notes). You should receive those by early next week.

Regarding the new requests below, we will not be providing the records you are requesting. To that end, we are filing a motion to quash the Rule 17(c) subpoena as to paragraph 26, which largely requests the same type of information. That will be filed by the end of the day.

Thanks,  
Gavin

**Gavin W. Bruce**

ASSISTANT UNITED STATES ATTORNEY

UNITED STATES ATTORNEY'S OFFICE

DISTRICT OF OREGON

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**From:** Janet Hoffman <[Janet@jhoffman.com](mailto:Janet@jhoffman.com)>  
**Sent:** Thursday, February 2, 2023 10:44 AM  
**To:** Bruce, Gavin (USAOR) <[gbruce@usa.doj.gov](mailto:gbruce@usa.doj.gov)>  
**Cc:** Katherine Marchant <[katie@jhoffman.com](mailto:katie@jhoffman.com)>  
**Subject:** [EXTERNAL] follow up on protective order and document request

Gavin

We would like to send to Anne via drop box the documents you provided to us. We need her help to review them and figure out our response to the Endeavor victim impact statement. What is your

position? As you know time is of the essence and these allegations are new to our case.

Second, we need WME-Endeavor's communications with you and/or your agents regarding their allegations against Anne. This would extend from the outset of the prosecution through today. The basis of our request is founded on Brady – Due Process. As part of multiple communications with you, most recently in October following the press release, the government's position is that Anne did not steal from WCMC and she did not plead to a theft offense. Earlier in our work on Anne's behalf, when we asked for Endeavor's internal investigation forensic report and outlined our need for the information, you responded that the government engaged in its own investigation, and, although you accept a complaint, you do not rely on the complaint for charging purposes. Assuming the complainant's in this case alleged she stole from them from the inception of the case, the government did not find (beyond the speculative allegations you shared with us in our negotiation posture) evidence of theft by Anne from WCMC. Their complaints and your work to corroborate their complaints is now relevant to our efforts to defend against their position. Additionally, assuming you conferred with the complainants prior to your plea offer, we need to understand their position regarding the plea and what they articulated was their interest in resolving the case.

Finally, in our current posture of needing to refute Endeavor and or its affiliates, impact statement as a biased document, we would also like to know what role if any they played in the press release issued by your office. As we have pointed out earlier in our pleadings, the claim of "serial fraudster" has been used repeatedly by WME in its pleadings and fits their theory, not yours. Were they interviewed or did they provide input into the press release? What information did they provide?

We need to know the existence of the documents outlined above and if this is going to be a contested issue. We may need to seek another continuance if we need obtain a court order to secure the information.

Thanks  
Janet